1	QUINN EMANUEL URQUHART & SULLIV	VAN, LLP
2	Diane M. Doolittle (CA Bar No. 142046)	Andrew H. Schapiro (admitted pro hac vice)
	dianedoolittle@quinnemanuel.com Sara Jenkins (CA Bar No. 230097)	andrewschapiro@quinnemanuel.com Teuta Fani (admitted <i>pro hac vice</i> )
3	sarajenkins@quinnemanuel.com	teutafani@quinnemanuel.com
4	555 Twin Dolphin Drive, 5th Floor	191 N. Wacker Drive, Suite 2700
5	Redwood Shores, CA 94065	Chicago, IL 60606
3	Telephone: (650) 801-5000 Facsimile: (650) 801-5100	Telephone: (312) 705-7400 Facsimile: (312) 705-7401
6	Facsimile: (630) 801-3100	1 acsimile. (312) 703-7401
7	Stephen A. Broome (CA Bar No. 314605)	Josef Ansorge (admitted pro hac vice)
8	stephenbroome@quinnemanuel.com Viola Trebicka (CA Bar No. 269526)	josefansorge@quinnemanuel.com Xi ("Tracy") Gao (CA Bar No. 326266)
0	violatrebicka@quinnemanuel.com	tracygao@quinnemanuel.com
9	Crystal Nix-Hines (Bar No. 326971)	Carl Spilly (admitted <i>pro hac vice</i> )
10	crystalnixhines@quinnemanuel.com	carlspilly@quinnemanuel.com
10	Alyssa G. Olson (CA Bar No. 305705)	1300 I Street NW, Suite 900
11	alyolson@quinnemanuel.com	Washington D.C., 20005
	865 S. Figueroa Street, 10th Floor	Telephone: (202) 538-8000
12	Los Angeles, CA 90017	Facsimile: (202) 538-8100
13	Telephone: (213) 443-3000 Facsimile: (213) 443-3100	
14	1 acsimile. (213) 443-3100	
17	Jomaire Crawford (admitted pro hac vice)	Jonathan Tse (CA Bar No. 305468)
15	jomairecrawford@quinnemanuel.com	jonathantse@quinnemanuel.com
1.0	51 Madison Avenue, 22nd Floor	50 California Street, 22nd Floor
16	New York, NY 10010	San Francisco, CA 94111
17	Telephone: (212) 849-7000	Telephone: (415) 875-6600
1.0	Facsimile: (212) 849-7100	Facsimile: (415) 875-6700
18	Counsel for Defendant Google LLC	
19	UNITED STATES	DISTRICT COURT
20		JIFORNIA, OAKLAND DIVISION
21	CHASOM BROWN, WILLIAM BYATT,	Case No. 4:20-cv-03664-YGR-SVK
22	JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO,	DECLARATION OF JONATHAN TSE IN
23	individually and on behalf of themselves and all others similarly situated,	SUPPORT OF GOOGLE LLC'S MOTION TO SEAL PORTIONS OF GOOGLE LLC'S
		OPPOSITION TO PLAINTIFFS'
24	Plaintiffs,	SUPPLEMENTAL SANCTIONS BRIEF
25	V.	PURSUANT TO DKT. 624
26	GOOGLE LLC,	Judge: Hon. Susan van Keulen, USMJ
27	Defendant.	
28		

Case No. 4:20-cv-03664-YGR-SVK

I, Jonathan Tse, declare as follows:

- I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
- 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 682.
- 3. I have reviewed the documents that Google seeks to file under seal pursuant to Civil Local Rule 79-5. Based on my review, there is good cause to seal the following information:

Document	Basis for Sealing
Google LLC's Opposition to	The information requested to be sealed contains Google's
Plaintiffs' Supplemental Sanctions	highly confidential and proprietary information regarding
Brief Pursuant to Dkt. 624	highly sensitive features of Google's internal systems and
	operations, including various types of Google's internal
Pages 1:13, 2:6, 2:18, 2:22-23,	projects, data signals, and logs, and their proprietary
2:26, 2:28, 3:1-6, 3:8-9, 4:10, 4:14,	functionalities, that Google maintains as confidential in the
5:12, 8:7	ordinary course of its business and is not generally known
	to the public or Google's competitors. Such confidential and
	proprietary information reveals Google's internal strategies,
	system designs, and business practices for operating and
	maintaining many of its important services, and falls within
	the protected scope of the Protective Order entered in this
	action. See Dkt. 81 at 2-3. Public disclosure of such
	confidential and proprietary information could affect
	Google's competitive standing as competitors may alter their systems and practices relating to competing products.
	It may also place Google at an increased risk of
	cybersecurity threats, as third parties may seek to use the
	information to compromise Google's internal practices
	relating to competing products.
Second Supplemental Declaration	The information requested to be sealed contains Google's
of Martin Sramek in Response to	highly confidential and proprietary information regarding
May 20, 2022 Order	highly sensitive features of Google's internal systems and
3	operations, including various types of Google's internal
Pages 1:10, 1:16-18, 2:18, 2:20-24,	projects, data signals, and logs, and their proprietary
2:26-3:3, 3:5-8	functionalities, that Google maintains as confidential in the
	ordinary course of its business and is not generally known
	to the public or Google's competitors. Such confidential and
	proprietary information reveals Google's internal strategies,
	system designs, and business practices for operating and

1		maintaining many of its important services, and falls within
2		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
3		confidential and proprietary information could affect Google's competitive standing as competitors may alter
4		their systems and practices relating to competing products.
5		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
6		information to compromise Google's internal practices relating to competing products.
7	Exhibit 1 to Trebicka Declaration	The information requested to be sealed contains Google's
8	PDF Pages 2-3	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
9		operations, including various types of Google's internal projects, data signals and logs,, that Google maintains as
10		confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
11		Such confidential and proprietary information reveals
12		Google's internal strategies, system designs, and business practices for operating and maintaining many of its
13		important services, and falls within the protected scope of
		the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
14		information could affect Google's competitive standing as
15		competitors may alter their systems and practices relating to
16		competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may
		seek to use the information to compromise Google's internal
17	Edition Edit Date	practices relating to competing products.
18	Exhibit 2 to Trebicka Declaration	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
19	Pages 140:11, 140:14-15, 140:18	highly sensitive features of Google's internal systems and
		operations, including various types of Google's internal
20		projects and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of
21		its business and is not generally known to the public or
22		Google's competitors. Such confidential and proprietary
23		information reveals Google's internal strategies, system designs, and business practices for operating and
		maintaining many of its important services, and falls within
24		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
25		confidential and proprietary information could affect
26		Google's competitive standing as competitors may alter
27		their systems and practices relating to competing products.  It may also place Google at an increased risk of
		cybersecurity threats, as third parties may seek to use the
28		

1		information to compromise Google's internal practices relating to competing products.
2	Exhibit 3 to Trebicka Declaration	The information requested to be sealed contains Google's
3		highly confidential and proprietary information regarding
4	Seal Entirely	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
4		projects, data signals, and logs, and their proprietary
5		functionalities, that Google maintains as confidential in the
6		ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and
7		proprietary information reveals Google's internal strategies,
8		system designs, and business practices for operating and maintaining many of its important services, and falls within
		the protected scope of the Protective Order entered in this
9		action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
10		Google's competitive standing as competitors may alter
11		their systems and practices relating to competing products.  It may also place Google at an increased risk of
12		cybersecurity threats, as third parties may seek to use the
		information to compromise Google's internal practices
13		relating to competing products.
14	Exhibit 4 to Trebicka Declaration	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
15	Seal Entirely	highly sensitive features of Google's internal systems and
16		operations, including various types of Google's internal projects and their proprietary functionalities, as well as
17		internal metrics, that Google maintains as confidential in the
		ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and
18		proprietary information reveals Google's internal strategies,
19		system designs, and business practices for operating and maintaining many of its important services, and falls within
20		the protected scope of the Protective Order entered in this
21		action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
22		Google's competitive standing as competitors may alter
23		their systems and practices relating to competing products.  It may also place Google at an increased risk of
		cybersecurity threats, as third parties may seek to use the
24		information to compromise Google's internal practices relating to competing products.
25	Exhibit 5 to Trebicka Declaration	The information requested to be sealed contains Google's
26	Pages 4:12, 4:18, 4:21, 5:14-15,	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
27	198:7, 198:18, 199:17, 201:4-5,	operations, including various types of Google's internal
28	372:11, 372: 15, 390:1-2, 390:15, 390:20	projects, that Google maintains as confidential in the
23	370.20	ordinary course of its business and is not generally known

1		to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies,
2		system designs, and business practices for operating and
3		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
4		action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
5		Google's competitive standing as competitors may alter
6		their systems and practices relating to competing products.
		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
7		information to compromise Google's internal practices
8		relating to competing products.
9	Exhibit 7 to Trebicka Declaration	The information requested to be sealed contains Google's
1	Pages 94:15-24, 96:4, 97:24,	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
10	101:11, 101:15, 101:18	operations, including various types of Google's internal
11		projects and their proprietary functionalities, as well as
12		internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known
12		to the public or Google's competitors. Such confidential and
13		proprietary information reveals Google's internal strategies,
14		system designs, and business practices for operating and
		maintaining many of its important services, and falls within
15		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
16		confidential and proprietary information could affect
17		Google's competitive standing as competitors may alter
		their systems and practices relating to competing products.  It may also place Google at an increased risk of
18		cybersecurity threats, as third parties may seek to use the
19		information to compromise Google's internal practices
		relating to competing products.
20	Exhibit 10 to Trebicka	The information requested to be sealed contains Google's
21	Declaration	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
22	Pages 409:1, 410:13, 410:17,	operations, including various types of Google's internal
	411:22, 412:5-6, 412:10, 412:12,	projects and internal metrics, that Google maintains as
23	413:7, 415:19-21, 417:11, 419:23, 418:1, 418:4, 418:16, 419:23,	confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
24	410.1, 410.4, 410.10, 419.23, 420:2, 420:7	Such confidential and proprietary information reveals
25		Google's internal strategies, system designs, and business
23		practices for operating and maintaining many of its
26		important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-
27		3. Public disclosure of such confidential and proprietary
		information could affect Google's competitive standing as
28		competitors may alter their systems and practices relating to

1 2 3	competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
4	4. Google's request is narrowly tailored in order to protect its confidential information.
5	These redactions are limited in scope and volume. Because the proposed redactions are narrowly
6	tailored and limited to portions containing Google's highly-confidential or confidential information,
7	Google requests that the portions of the aforementioned documents be redacted from any public
8	version of those documents.
9	5. Google does not seek to redact or file under seal any of the remaining portions of
10	Google LLC's Opposition to Plaintiffs' Supplemental Sanctions Brief Pursuant to Dkt. 624 not
11	indicated in the table above.
12	I declare under penalty of perjury of the laws of the United States that the foregoing is true
13	and correct. Executed in San Francisco, California on August 18, 2022.
14	
15	DATED: August 18, 2022 QUINN EMANUEL URQUHART &
16	SULLIVAN, LLP
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18	By/s/Jonathan Tse
19	Jonathan Tse Attorney for Defendant
20	Attorney for Defendant
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